

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Haley Alafair Payne, as Personal
Representative and Executrix of the Estate of
Paul Michael Edward Payne, deceased,

Plaintiff,

v.

CSX Transportation, Inc.,

Defendant.

Case No. 3:21-cv-1068

Judge Jeffrey J. Helmick

NOTICE OF DEPOSITION DUCES TECUM OF ALAN PAGELS
VIA VIDEOCONFERENCE

Defendant CSX Transportation, Inc., by and through counsel, hereby gives notice that it will take the deposition of Alan Pagels, commencing at 11:00 a.m. EST on Friday, June 30, 2023.

The deposition will be recorded stenographically by a court reporter who is authorized to administer oaths in Ohio. This deposition shall continue from day to day until completed.

The witness, court reporter and counsel for all parties will participate in this deposition by means of videoconference via Virtual Zoom at remote locations to the extent permitted by law.

Be advised that Alan Pagels is being requested to produce the following items and documents at the time of his deposition:

1. All materials reviewed by Mr. Pagels that relate to the *Payne* case;
2. Mr. Pagels' entire file, including any reports, notes or other recorded information created by Mr. Pagels relating to the *Payne* case; and,
3. Any medical literature or other materials reviewed or relied upon by Mr. Pagels relating to the *Payne* case.

Respectfully submitted,

/s/James R. Carnes

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CSX Transportation, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed this 23rd day of June 2023, through the Court's Electronic Filing System. Parties will be served, and may obtain copies electronically, through the operation of the Electronic Filing System.

/s/ James R. Carnes

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